

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF MICHIGAN**

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JANE DOE,

Plaintiff,

Case No: 21-CV-12492

v.

Hon. Shalina D. Kumar  
Magistrate Judge Elizabeth A. Stafford

UNIVERSITY OF MICHIGAN, et al.,

Defendants.

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**DEFENDANTS' NOTICE OF SUPPLEMENTAL AUTHORITY**

Since Defendants' initial filing of their Motion to Dismiss on March 10, 2022, two cases have been decided by the Sixth Circuit:

1. *Arocho v. Ohio Univ.*, No. 20-4239, 2022 WL 819734 (6th Cir. Mar. 18, 2022)<sup>1</sup> (attached as *Exhibit A*); and
2. *Snyder-Hill v. Ohio State Univ.*, 48 F.4th 686 (6th Cir. 2022) (attached as *Exhibit B*).

Both cases address issues before this Court on Defendants' pending motion; namely standing and, in the case of *Snyder-Hill*, the accrual date for a Title IX cause of action. As

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<sup>1</sup> In its primary brief, Defendants cited the *Arocho* U.S. District Court opinion, which was affirmed on appeal.

Defendants have already filed a reply brief, they will not provide further argument herein other than to state that, because of the factual similarities and differences between the present case and those above, this Court should be guided by the reasoning and analysis of *Arocho*. Defendants welcome further briefing opportunities on the application of this authority.

Respectfully submitted,

THE UNIVERSITY OF MICHIGAN  
OFFICE OF THE VICE PRESIDENT  
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Dated: October 10, 2022

**CERTIFICATE OF SERVICE**

STATE OF MICHIGAN                  )  
  )  
  ) ss  
COUNTY OF WASHTENAW                )

I hereby certify that on October 10, 2022, I electronically filed *Defendants' Notice of Supplemental Authority* with the Clerk of the Court using the ECF System.

By: /s/ Jennifer L. Traver  
Jennifer L. Traver  
Legal Assistant